

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	Case No. 09-35697
My Ranch, Inc.	)	
d/b/a Fresh Harvest Market	)	
	)	Judge Schmetterer
Debtor and Debtor in Possession	)	
_____	)	
	)	Chapter 11
Cecelia N. Johnson	)	Case No. 09-37011
	)	
Debtor and Debtor in Possession	)	Hearing: March 2, 2010 at 10:00 AM

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that on **March 2, 2010 at 10:00 a.m.**, the undersigned will appear before the Honorable Judge Jack B. Schmetterer, Bankruptcy Judge, in Courtroom 682, Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois the Bankruptcy Court for the Northern District of Illinois, Eastern Division, and shall then and there present **DEBTORS' MOTION TO EXTEND DEADLINE TO FILE CHAPTER 11 PLAN AND DISCLOSURE STATEMENT** a copy of which is enclosed herewith and served upon you.

/s/ Forrest L. Ingram

Forrest L. Ingram, #3129032  
Philip Groben  
Michael Ohlman  
Forrest L. Ingram, P.C.  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Philip Groben, an attorney, certify that I have served a true and correct copy of the above and foregoing notice and the documents to which it refers on those whose names appear on the attached services list by electronic case filing, or by US Mail, as indicated on the list, on February 18, 2010.

/s/ Philip Groben

**SERVICE LIST**

**VIA CM/ECF:**

**William T. Neary**  
**Office of the U.S. Trustee, Region 11**  
219 S. Dearborn, 8<sup>th</sup> Floor  
Chicago, IL 60602

**Coactiv Capital Partners, Inc.**  
c/o David P. Vallas  
Wildman Harrold Allen & Dixon  
225 West Wacker Drive  
Chicago, IL 60606

**The Huntington National Bank**  
c/o Monette W Cope  
Weltman Weinberg & Reis Co LPA  
180 North LaSalle St Ste 2400  
Chicago, IL 60601

**Fifth Third Bank**  
c/o David L Hazan  
Diver, Grach, Quade & Masini LLP  
111 North County Street  
Waukegan, IL 60085

**National City Commercial Capital Company, LLC**  
c/o Vincent T Borst  
Borst & Collins, LLC  
180 N Stetson Ave Suite 3050  
Chicago, IL 60601

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**MOTION TO EXTEND DEADLINE TO FILE CHAPTER 11 PLAN  
AND DISCLOSURE STATEMENT**

Now Comes the Debtors and Debtors in Possession, My Ranch, Inc. (“My Ranch”), by and through their attorneys, Forrest L. Ingram, P.C., and moves this Honorable Court for an extension of Time to File Amended Chapter 11 Plan and Disclosure Statement. In Support thereof, the Debtors states as follows:

1. My Ranch filed its chapter 11 bankruptcy case on September 25, 2009.
2. On September 29, 2009, this Court entered an order setting January 14, 2010 as the deadline for My Ranch to file its Disclosure Statement and Plan. The Court’s order also sets a status on the Disclosure Statement and Plan for January, 19 2010, at 10:30am.
3. Johnson filed for protection under chapter 11 on October 5, 2009.
4. On October 28, this case was reassigned to Judge Schmetterer. The Court then entered an order setting January 14, 2010 as the deadline for Johnson to file her Disclosure Statement and Plan. The Court’s order also sets a status on the Disclosure Statement and Plan for January, 19 2010, at 10:30am.

5. On January 14, 2010, this Court granted an extension to the time to file a chapter 11 plan of reorganization, and reset the due date to February 19, 2010. The order set status on the plan for March 4, 2010 at 10:30.

6. My Ranch's President, Rasheeda Oghafua ("Oghafua"), is in the midst of negotiations with banks and other lenders willing to provide financing to My Ranch so as to aid in its reorganization. Oghafua requires time to complete negotiations with these lenders. Upon successful negotiation with a lender, My Ranch will be able to propose a more feasible plan which will assure its success in reorganization.

7. Also on the Court's calendar for March 4, 2010 is a motion to convert or dismiss the My Ranch bankruptcy case. Debtor believes that a deadline of March 2, 2010 will give interested parties enough time to review the plan before the March 4 hearing.

WHEREFORE, My Ranch, Inc. respectfully requests that this Court enter an order extending time to file Debtor's Plan and Disclosure Statement until March 2, 2010; and for such other and further relief as this court may deem just.

Respectfully submitted,

CECELIA N. JOHNSON and  
MY RANCH, INC.

By: /s/ Philip Groben  
One of their attorneys

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